

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

STEPHEN GRAY, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE,  
THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC.,  
THE 401(k) INVESTMENT  
COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

Civil Action No: 07 Civ. 9790 (SHS)

**MOTION FOR ADMISSION OF  
ROBERT IZARD PRO HAC VICE**

SHAUN ROSE, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE,  
THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC.,  
THE 401(k) INVESTMENT  
COMMITTEE, and JOHN DOES 1 - 10,

Defendants.

Civil Action No: 07 Civ. 10294 (DC)

MEREDITH TRANBERG, individually  
and on behalf of all others similarly situated

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE,  
THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC.,  
THE 401(k) INVESTMENT  
COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

Civil Action No: 07 Civ. 10341 (UA)

FILED  
U.S. DISTRICT COURT  
2008 JAN 17 AM 11:24  
S.D. OF N.Y.

JAN 17 2008

638 534 - 25-1

-----X

ANTON RAPPOLD, individually and on :  
behalf of all others similarly situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 10396 (UA)

CITIGROUP INC., CITIBANK, N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and JOHN :  
and JANE DOES 1 - 10, :

Defendants. :

-----X

SAMIER TADROS, on Behalf of All :  
Others Similarly Situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 10442 (UA)

CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants. :

-----X

-----X  
STEPHAN FIORINO, individually and on :  
behalf of all others similarly situated, :  
:   
Plaintiff, : Civil Action No: 07 Civ. 10458 (UA)  
v. :  
:   
CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
:   
Defendants. :  
-----X

JAMES BOLLA, individually and on behalf :  
of all others similarly situated, :  
:   
Plaintiff, : Civil Action No: 07 Civ. 10461 (UA)  
v. :  
:   
CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
:   
Defendants. :  
-----X

MARK GEROULO, individually, on behalf :  
of the CITIGROUP 401(k) Plan, the :  
CITIBUILDER 401 (K) PLAN FOR :  
PUERTO RICO, and all others similarly, :  
:   
Plaintiff, : Civil Action No: 07 Civ. 10472 (UA)  
v. :  
:   
CITIGROUP, INC., CITIBANK, N.A., :  
THE PLAN ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
MICHAEL E. SCHLEIN, JOHN DOES :  
1-10, THE CITIGROUP 401(k) PLAN :  
INVESTMENT COMMITTEE and JOHN :  
:

DOES 10-20, C. MICHAEL :  
ARMSTRONG, ALAN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ, ANN DIBBLE JORDAN, :  
ANDREW N. LIVERIS, DUDLEY C. :  
MECUM, ANNE M. MULCAHY, :  
RICHARD D. PARSONS, ANDRALL E. :  
PEARSON, CHARLES PRINCE, JUDITH :  
RODIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, SANFORD I. WEILL, :  
: :  
Defendants. :  
-----X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, William Bernarduci, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of Robert Izard. Mr. Izard's address is:

Schatz Nobel, Izard, P.C.  
20 Church Street, Suite 1700  
Hartford, Connecticut 06103  
Phone Number: (860) 493 6292  
Fax Number: (860) 493 6292  
[rizard@snilaw.com](mailto:rizard@snilaw.com)

Robert Izard is a member in good standing of the Bar of the State of Connecticut. He was admitted to the Connecticut bar on May 28, 1987. Attached hereto as Exhibit A is a Certificate of Good Standing. Mr. Izard has subsequently been admitted to practice in the following courts:

- a. United States District Court for the District of Connecticut (1987);
- b. All Courts of the State of North Carolina (1983);
- c. United States District Court for the Middle District of North Carolina (1985);
- d. United States District Court for the Western District of North Carolina (1983);
- e. United States Court of Appeals for the Fourth Circuit (1986);

- f. United States Court of Appeals for the Second Circuit (1990);
- g. United States Supreme Court (1991);
- h. United States District Court for the District of Colorado (2001);
- i. United States Court of Appeals for the First Circuit (2006); and
- j. United States Court of Appeals for the Fifth Circuit (2006)

Dated: January 16, 2008

Respectfully submitted,

SCHATZ NOBEL IZARD, P.C.

A handwritten signature in black ink, appearing to read 'William Bernarduci', is written over a horizontal line.

William Bernarduci (WB 5785)  
20 Church Street, Suite 1700  
Hartford, Connecticut 06103  
Phone Number: (860) 493 6292  
Fax Number: (860) 493 6292



**State of Connecticut**  
**Supreme Court**

*I, Michèle T. Angers, Chief Clerk of the Supreme Court of the State of Connecticut and keeper of the Seal thereof,*

Do hereby certify that, in the Superior Court at **Hartford**,  
on the **twenty-eighth**, day of **May**,  
**1987**,

**Robert A. Izard, Jr.**

*of*

**West Hartford, Connecticut**

*having been examined and found duly qualified, was sworn as an attorney and admitted to practice before all the courts of this state, and that said attorney is a member in good standing of the Bar of this State pursuant to Practice Book §2-65.*

*In Testimony Whereof, I have hereunto set my hand and affix  
the Seal of the Supreme Court of the State of Connecticut, at  
Hartford, this **sixteenth** day of  
**January**, 20 **08**.*

A handwritten signature in cursive script that reads "Michèle T. Angers".

**Michèle T. Angers**

*Chief Clerk*



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16<sup>th</sup> day of January 2007, a copy of the foregoing was served by U.S. Mail, postage pre-paid, to the counsel of record on the attached service list. Parties may also access this filing through the Court's system.

A handwritten signature in black ink, reading "Nancy A. Kulesa", written over a horizontal line.

Nancy A. Kulesa

**CITIGROUP ERISA LITIGATION  
SERVICE LIST**

**Counsel For Defendants:**

Lawrence B. Pedowitz, Esq.  
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Fax: (212) 403-2000

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al.

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(07cv10442-SHS)

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(07cv10461-UA)

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(07cv10396-UA)

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Attorneys for Plaintiff Meredith Tranberg  
(07cv10341-UA)



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Attorneys for Plaintiff Mark Geroulo  
(07cv10472-UA)

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New York, New York 10007  
T: (212) 385-0066

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
STEPHEN GRAY, individually and on :  
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 9790 (SHS)

**DECLARATION OF WILLIAM  
BERNARDUCI IN SUPPORT OF  
MOTION FOR ADMISSION OF  
ROBERT IZARD PRO HAC VICE**

-----X  
SHAUN ROSE, Individually and On :  
Behalf of All Others Similarly Situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 10, :

Defendants. :

Civil Action No: 07 Civ. 10294 (DC)

FILED  
U.S. DISTRICT COURT  
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S.D. OF N.Y.

-----X  
MEREDITH TRANBERG, individually :  
and on behalf of all others similarly situated :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 10341 (UA)

-----X

-----X		
ANTON RAPPOLD, individually and on	:	
behalf of all others similarly situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10396 (UA)
v.	:	
	:	
CITIGROUP INC., CITIBANK, N.A.,	:	
CHARLES PRINCE, THE PLANS	:	
ADMINISTRATIVE COMMITTEE OF	:	
CITIGROUP INC., THE 401(k)	:	
INVESTMENT COMMITTEE, and JOHN	:	
and JANE DOES 1 - 10,	:	
	:	
Defendants.	:	

-----X		
SAMIER TADROS, on Behalf of All	:	
Others Similarly Situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10442 (UA)
v.	:	
	:	
CITIGROUP INC., CHARLES O.	:	
PRINCE, C. MICHAEL ARMSTRONG,	:	
ALAIN J.P. BELDA, GEORGE DAVID,	:	
KENNETH T. DERR, JOHN M. DEUTCH,	:	
ROBERTO HERNANDEZ RAMIREZ,	:	
ANN DIBBLE JORDAN, KLAUS	:	
KLEINFELD, ANDREW N. LIVERIS,	:	
ANNE MULCAHY, RICHARD D.	:	
PARSONS, JUDITH RODIN, ROBERT E.	:	
RUBIN, ROBERT E. RUBIN, FRANKLIN	:	
A. THOMAS, JOHN DOES 1-20 (BEING	:	
CURRENT AND FORMER MEMBERS	:	
OF THE PLANS ADMINISTRATIVE	:	
COMMITTEE OF CITIGROUP INC.)	:	
and JOHN DOES 21-40 (BEING	:	
CURRENT AND FORMER MEMBERS	:	
OF THE INVESTMENT COMMITTEE	:	
OF THE CITIGROUP INC. 401(K) PLAN),	:	
	:	
Defendants.	:	
-----X		

-----X		
STEPHAN FIORINO, individually and on	:	
behalf of all others similarly situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10458 (UA)
v.	:	
	:	
CITIGROUP INC., CITIBANK N.A.,	:	
CHARLES PRINCE, THE PLANS	:	
ADMINISTRATIVE COMMITTEE OF	:	
CITIGROUP INC., THE 401(k)	:	
INVESTMENT COMMITTEE, and	:	
JOHN DOES 1 - 20, :	:	
	:	
Defendants.	:	

-----X		
JAMES BOLLA, individually and on behalf :	:	
of all others similarly situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10461 (UA)
v.	:	
	:	
CITIGROUP INC., CITIBANK N.A.,	:	
CHARLES PRINCE, THE PLANS	:	
ADMINISTRATIVE COMMITTEE OF	:	
CITIGROUP INC., THE 401(k)	:	
INVESTMENT COMMITTEE, and	:	
JOHN DOES 1 - 20,	:	
	:	
Defendants.	:	

-----X		
MARK GEROULO, individually, on behalf :	:	
of the CITIGROUP 401(k) Plan, the	:	
CITIBUILDER 401 (K) PLAN FOR	:	
PUERTO RICO, and all others similarly,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10472 (UA)
v.	:	
	:	
CITIGROUP, INC., CITIBANK, N.A.,	:	
THE PLAN ADMINISTRATIVE	:	
COMMITTEE OF CITIGROUP, INC.,	:	
MICHAEL E. SCHLEIN, JOHN DOES	:	
1-10, THE CITIGROUP 401(k) PLAN	:	
INVESTMENT COMMITTEE and JOHN	:	

DOES 10-20, C. MICHAEL :  
ARMSTRONG, ALAN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ, ANN DIBBLE JORDAN, :  
ANDREW N. LIVERIS, DUDLEY C. :  
MECUM, ANNE M. MULCAHY, :  
RICHARD D. PARSONS, ANDRALL E. :  
PEARSON, CHARLES PRINCE, JUDITH :  
RODIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, SANFORD I. WEILL, :  
: :  
Defendants. :  
-----X

I, William Bernarduci, hereby declare as follows:

1. I am an attorney at Schatz Nobel Izard, P.C., counsel for Plaintiff, Shaun Rose, in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Robert Izard as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York on November 24, 1997. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Robert Izard since 2004.

4. Mr. Izard is a partner at Schatz Nobel Izard, P.C., in Hartford, Connecticut.

5. I have found Mr. Izard to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

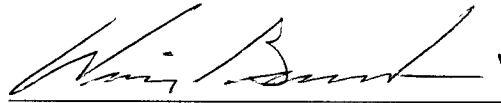
6. Accordingly, I am pleased to move the admission of Robert Izard pro hac vice.

7. I respectfully submit a proposed order granting the admission of Robert Izard, pro

hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Robert Izard pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: January 16, 2008

A handwritten signature in black ink, appearing to read 'William Bernarduci', is written over a horizontal line.

William Bernarduci (WB 5785)  
20 Church Street, Suite 1700  
Hartford, Connecticut 06103  
Phone Number: (860) 493 6292  
Fax Number: (860) 493 6292

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
STEPHEN GRAY, individually and on :  
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 9790 (SHS)

**[PROPOSED] ORDER ADMITTING  
ROBERT IZARD PRO HAC VICE**

-----X  
SHAUN ROSE, Individually and On :  
Behalf of All Others Similarly Situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 10, :

Defendants. :

Civil Action No: 07 Civ. 10294 (DC)

-----X  
MEREDITH TRANBERG, individually :  
and on behalf of all others similarly situated :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 10341 (UA)

-----X  
ANTON RAPPOLD, individually and on :  
behalf of all others similarly situated, :  
 :  
Plaintiff, : Civil Action No: 07 Civ. 10396 (UA)  
v. :  
 :  
CITIGROUP INC., CITIBANK, N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and JOHN :  
and JANE DOES 1 - 10, :  
 :  
Defendants. :  
-----X

SAMIER TADROS, on Behalf of All :  
Others Similarly Situated, :  
 :  
Plaintiff, : Civil Action No: 07 Civ. 10442 (UA)  
v. :  
 :  
CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :  
 :  
Defendants. :  
-----X



-----X

STEPHAN FIORINO, individually and on :  
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 10458 (UA)

-----X

JAMES BOLLA, individually and on behalf :  
of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 10461 (UA)

-----X

MARK GEROULO, individually, on behalf :  
of the CITIGROUP 401(k) Plan, the :  
CITIBUILDER 401 (K) PLAN FOR :  
PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., :  
THE PLAN ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
MICHAEL E. SCHLEIN, JOHN DOES :  
1-10, THE CITIGROUP 401(k) PLAN :  
INVESTMENT COMMITTEE and JOHN :

Civil Action No: 07 Civ. 10472 (UA)

DOES 10-20, C. MICHAEL :  
ARMSTRONG, ALAN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ, ANN DIBBLE JORDAN, :  
ANDREW N. LIVERIS, DUDLEY C. :  
MECUM, ANNE M. MULCAHY, :  
RICHARD D. PARSONS, ANDRALL E. :  
PEARSON, CHARLES PRINCE, JUDITH :  
RODIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, SANFORD I. WEILL, :  
: :  
Defendants. :  
-----X

Upon the motion of attorney William Bernarduci for admission of Robert Izard pro hac vice,  
and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Robert Izard  
20 Church Street, Suite 1700  
Hartford, Connecticut 06103  
Phone Number: (860) 493 6292  
Fax Number: (860) 493 6292

is admitted to practice pro hac vice as counsel for in the above captioned case in the United States

District Court for the Southern District of New York.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Sidney Stein United States District Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16<sup>th</sup> day of January 2007, a copy of the foregoing was served by U.S. Mail, postage pre-paid, to the counsel of record on the attached service list. Parties may also access this filing through the Court's system.

A handwritten signature in black ink, appearing to read "Nancy A. Kulesa", written over a horizontal line.

Nancy A. Kulesa

**CITIGROUP ERISA LITIGATION  
SERVICE LIST**

**Counsel For Defendants:**

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John Lynch, Esq.  
Bradley R. Wilson, Esq.  
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LLP  
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Tel: (212) 403-1000  
Fax: (212) 403-2000

Attorneys for Defendants Citigroup, Inc., et  
al.

**Counsel for Plaintiffs:**

Robert I. Harwood, Esq.  
Jeffrey M. Norton, Esq.  
HARWOOD FEFER LLP  
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New York, NY 10022  
Tel: (212) 935-7400  
Fax: (212) 753-3630

Attorneys for Plaintiff Samier Tadros  
(07cv10442-SHS)

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Jenkintown, PA 19046-3535  
Tel: (215) 481-0273

Attorneys for Plaintiff James Bolla  
(07cv10461-UA)

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LLP  
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Tel: (212) 223-3900  
Fax: (212) 371-5969

Attorneys for Plaintiff Anton Rappold  
(07cv10396-UA)

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New York, New York 10022  
Tel: (212) 308-5858

Attorneys for Plaintiff Meredith Tranberg  
(07cv10341-UA)

Ronen Sarraf (RS 7694)  
Joseph Gentile  
SARRAF GENTILE LLP  
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New York, New York 10018  
T: 212-868-3610  
F: 212-918-7967

Attorneys for Plaintiff Mark Geroulo  
(07cv10472-UA)

Milo Silberstein  
DEALY & SILBERSTEIN, LLP  
225 Broadway, Suite 1405  
New York, New York 10007  
T: (212) 385-0066